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State of New Jersey
Department of Environmental Protection and Energy
Division of Responsible Party Site Remediation
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Trenton, NJ 08625-0028

Scott A. Weiner
Commissioner

Karl J. Delaney
Director

Raymond Basso
USEPA Region II
26 Federal Plaza
New York, NY 10278

JUL 07 1993

Dear Mr. Ran Basso:

Attached please find the second quarterly report submitted in accordance with the EPA/DEPE Enforcement Pilot Agreement. The reports are submitted on the New Jersey lead sites L. E. Carpenter and Hercules Incorporated. Both Reports are dated June 1993 and are reflective of the work conducted and impediments up to that time. The next report will be submitted in September of this year.

We have reviewed the draft agreement for the EPA's lead site, NL Industries in Pedricktown, and approved. You were verbally notified of this in the April EPA/DEPE Monthly meeting. To date we have not received the finalized agreement. The draft ROD for this site is currently being reviewed within DEPE. I would like to discuss other EPA lead pilot opportunities with you in the near future.

Please contact me directly with questions at (609) 633-1455.

Sincerely,

Bruce Venner

Bruce Venner, Chief
Bureau of Federal Case Management

c: Lance Miller
Karl Delaney
Ronald T. Corcoran
Robert Hayton
Roman Luzecky
Matthew Morrison



L. E. Carpenter Site
Wharton Borough, Morris County
Quarterly Progress Report 2
June 1993

The following is an update on the progress of the L. E. Carpenter Site pursuant to the EPA/State Pilot Agreement dated December 9, 1992.

The L. E. Carpenter site is presently moving out of the RI/FS phase of the remediation. The Final Supplemental Remedial Investigation was revised and approved in September of 1992. The Final Feasibility Report, November 1992, was conditionally approved subject to L. E. Carpenter addressing some outstanding issues. During the last quarter, the State and L. E. Carpenter have been discussing these outstanding issues pertinent to the Record of Decision (ROD) which was to be finalized in February, 1993. The following is a description of the problems encountered this quarter:

DISCHARGE OF TREATED GROUND WATER

The alternatives presented in the Feasibility Study discuss discharge of treated groundwater to the Rockaway River. Groundwater reinjection is not evaluated as a viable alternative. The Department informed L.E. Carpenter that it was necessary to further evaluate the groundwater reinjection alternative before choosing the preferred alternative. During the month of April, L. E. Carpenter conducted a well point and gamma logging investigation which further defined the extent of the product plume and the clay layer which exist at the site. The results of this investigation have given L. E. Carpenter and the Department the necessary confidence to propose discharge of final treated groundwater back into the aquifer.

At present, the Department is finalizing the discharge of treated groundwater limits which need to be incorporated into the proposed plan.

WETLANDS DISTURBANCE

EPA's main concern with the Feasibility Study focused on the disturbance of the Wetlands. A Wetlands Assessment was submitted and commented on by EPA on October 15, 1992. In response to EPA comments and following administrative requirements, L. E. Carpenter submitted additional information to EPA and applied for a Letter of Interpretation (LOI), pursuant to the New Jersey Freshwater Wetlands Protection Act Rules (N.J.A.C. 7:A-1 et seq) in January 1993. The LOI, which was issued April 14, 1993, determined that the wetlands and waters boundary lines as shown on the maps submitted are accurate. The wetlands have also been identified as being priority wetlands by the USEPA which will effect the classification and type of permit required should the proposed remediation effect the wetlands resource. L. E. Carpenter has adequately addressed this wetlands issue for the purpose of the Proposed Plan and Record of Decision. In accordance with State and Federal wetlands regulations, which have already been identified as ARAR's, a Statewide General Permit will be pursued should the remediation effect the resource.

RESOLUTION OF ISSUES

On May 14, 1993, the Department held a meeting with L. E. Carpenter and WESTON to discuss these issues. L. E. Carpenter needs to revise the chapter in the FS which discusses final discharge of treated groundwater as well as the cost runs. When the Department issues the discharge to groundwater limitations, all revised documentation will be submitted.

Activities Scheduled for July 1 to October 1, 1993

- I. Prepare Proposed Plan (PP) and forward copy to USEPA
- II. Hold public Meeting
- III. Finalize PP
- IV. Draft ROD

Hercules Incorporated
Gibbstown, Gloucester County
Quarterly Progress Report 2
June 23, 1993

The following is an update on the progress of the Hercules NPL Site pursuant to the EPA/State Pilot Agreement dated December 9, 1992.

The Hercules Site currently has two Operable Units (OU's), the Solid Waste Disposal Area (SWDA) and the Chemical Process Area. Site activities and problems encountered this quarter are described below.

SWDA

The RI for the SWDA has been approved by the Department. Additional time was required for approval as two revisions to the original submittal were necessary. The submission of the FS was delayed by Hercules' contractor so the Department has attempted to expedite review of the document, the review of the FS will be completed by the end of June and conditional approval is anticipated. A risk assessment is now being reviewed by the Department, which should not affect the overall schedule. It was submitted on June 28. An expedited review is being performed. Due to the delay in the FS submission, subsequent "milestones" have been revised accordingly. The ROD will still be completed in the fourth quarter of this federal fiscal year.

			<u>Revised Date</u>
Final RI Report/	Approval	03/15/93	6/22/93**
Final Endangerment Assessment/Final Base Line Risk Assessment	RP Submittal	06/28/93*	
Draft Final FS	RP Submittal	01/15/93	5/28/93
Final FS	Approval	03/15/93	7/15/93
Proposed Plan	Final	03/27/93	7/15/93
Public Comment	Initiation	03/27/93	7/15/93
Public Meeting		04/17/93	8/15/93
Draft ROD		05/27/93	9/05/93
Final ROD	Signed	06/27/93	9/26/93

** Conditional approval was April 14, 1993

* Submittal not originally scheduled, therefore there is no revised date.

Chemical Process Area

The RI Work Plan review was completed in mid June. This review was delayed due to internal priorities concerning regulations which the Department was committed to promulgate. Comments were sent to the RP on June 22, 1993. They were given a 45 day revision period due to the many tasks that are now required for the SWDA. Below are the "milestones" and the associated dates agreed to in the Pilot Agreement with the necessary revisions to those dates. Hercules anticipates a shorter time in the field than the first quarter report's revisions to the original dates noted, therefore newly revised dates have been included that reflect the schedule in the draft work plan:

			<u>Revised Date</u>
RI/FS Workplan	Approval	10/01/92	8/22/93
Draft RI Report/ Draft Endangerment Assessment/Draft Base Line Risk Assessment	RP Submittal	04/03/94	09/07/94
Final RI Report/ Final Endangerment Assessment/Final Base Line Risk Assessment	Approval	08/08/94	12/07/94